

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SARAH TONEY, on behalf of	)	
herself and others similarly situated,	)	
Plaintiff,	)	Case No. 1:13-cv-42
	)	
v.	)	Judge Grady
	)	
QUALITY RESOURCES, INC., et al.,	)	
Defendants	)	Jury Demanded

**PROPOSED DISCOVERY PLAN**

The parties jointly propose the following discovery plan:

- Deadline for Class Certification Motion: June 19, 2015.
- Deadline for class cert expert disclosures (with short summary of expected testimony): April 10, 2015 (Plaintiff) and May 8, 2015 (Defendant)
- Deadline for any class cert expert reports: April 24, 2015 (Plaintiff) and rebuttal May 22, 2015 (Defendant)
- Fact Discovery Cutoff: July 3, 2015 (court-ordered deadline)
- Merits/Damages/Other Expert Reports: 30 days after order on class certification; responses, 30 days after opening reports; rebuttal 30 days after responses
- Dispositive motions: may be filed at any time up to 30 days following expert rebuttal reports

To the extent that any motion is filed earlier than the deadline, the parties shall meet and confer in good faith to agree upon any revised dates in advance of presentment of such motion.

Respectfully submitted,

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